ADEQ
ARKANSAS
Department of Environmental Quality

Interoffice Memorandum

TO : Tammie Hynum, Manager, Technical Branch, Hazardous Waste Division (HWD)

THROUGH : Annette Cusher, Engineer Supervisor, Technical Branch, HWD

FROM : Clay McDaniel, Engineer, Technical Branch, HWD

DATE : July 15, 2009

SUBJECT : Cedar Chemical Facility - West Helena, AR
Comments on Wormald submittal:
Focused Feasibility Study Report for Site 3 dated June 29, 2009
AFIN 54-00068 EPA ID ARD990660649

The above mentioned report addresses contamination found in Site 3 by listing remediation options and then selects the option which best meets their criteria. The remedy chosen was to place a deed restriction on an area 0.26 acres located in Site 3.

To help in selecting a remedy, a model was made to calculate the potential for dinoseb to be released from the 0.26 acre area located in Site 3. This model is based on the assumption that dinoseb is located within the sub-surface soil from 4-8 feet bgs. However, this is a very rough approximation, and there are potentially higher concentrations of dinoseb below this sub-soil interval.

In addition, the horizontal extent of contamination at Site 3 has not been adequately delineated. Based on the data from the Facility Investigation Report dated June 28, 1996 prepared by Ensafe, the investigation of contamination at Site 3 mainly consisted of surface soil/sediment samples. Based on the contamination found in sub-surface soil borings completed at Site 3, there is a high probability of contamination located outside of the area identified in this report.

ADEQ made comments on the Facility Invest Report in a letter dated May 21, 2009. Comment no. 1 of this letter stated: “The statement that "no further delineation is required" is not necessarily correct and should be revised.” This comment was not adequately addressed and has thus carried over to inadequate data in this Focused Feasibility Study Report.

While a deed restriction may be the appropriate remedy, this decision should be based on more data to fully define the extent of contamination.

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